

JEREMY PINSON,
PLAINTIFF,

v.

No. _____

U.S. DEPARTMENT OF JUSTICE,
FEDERAL BUREAU OF PRISONS,
UNITED STATES OF AMERICA,
DEFENDANTS

CIVIL RIGHTS COMPLAINT SEEKING DECLARATORY AND INJUNCTIVE RELIEF

I. Jurisdiction and Venue

1. Jurisdiction is asserted pursuant to 5 U.S.C. 702-706; 28 U.S.C. 1331 and 2201-02.
2. Venue is asserted proper as the defendants are located in and conduct business in Washington, D.C.

II. Parties

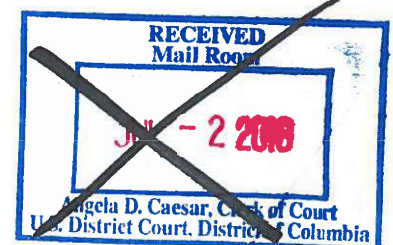
1. Plaintiff Jeremy Pinson R#16267-064 is a federal prisoner in the custody of defendants.
2. Defendants U.S. Department of Justice ("DOJ"), Federal Bureau of Prisons ("BOP") and United States of America are U.S. Government agencies or entities located in Washington, D.C.

III. Cause of Action

1. Violation of the 8th Amendment to the U.S. Constitution;
2. Violation of the 5th Amendment to the U.S. Constitution;
3. Violation of the Administrative Procedures Act;

IV. STATEMENT OF FACTS

1. The plaintiff has been diagnose by multiple medical and mental health professionals with Gender Dysphoria.
2. Gender Dysphoria is recognized as a real condition by the DSM-V.
3. The methods internationally accepted for treatment of Gender Dysphoria are the "WPATH Standards of Care".
4. The BOP has clinical practice guidelines for the treatment of Gender Dysphoria.



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5. The plaintiff was examined by an outside endocrinologist under contract with the BOP and she prescribed plaintiff with multiple medications which constitute "hormone therapy".
 6. The United States Congress in passing the Americans with Disabilities Act and Rehabilitation Act defined conditions such as Gender Dysphoria as being statutorily exempt from the disability statutes.
 7. The plaintiff has attempted to obtain disability relief, which defendant BOP refuses to provide citing the statutory bar on the treatment of Gender Dysphoria. As a result BOP is considering ending the prescribed treatment on political, not medical, grounds.
 8. The two disability statutes discriminate clearly and directly against transgender persons, and therefore violated the deliberate indifference and equal protection clauses of the 5th and 8th Amendments and the Administrative Procedures Act.
 9. If the plaintiff's hormone therapy is discontinued suddenly on the basis explained above, the plaintiff will likely suffer a heart attack or stroke, or other serious health complications.

IV. REQUESTED RELIEF

1. Injunction enjoining the sections of the Americans with Disabilities Act and Rehabilitation Act which direct nonaccommodation of conditions like Gender Dysphoria.
2. Declaratory Judgment holding that the disability bans violate the 5th 8th Amendments on the face of the statute and in its application to the plaintiff.
3. That costs and fees be taxed against defendants.

EXECUTED UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. 1746.



Jeremy Pinson #16267-064
USP Tucson
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Tucson AZ 85734
Plaintiff